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Sent: Thursday, November 13, 2008 4:29 PM
To: 'Wald, Johanna'; carl.zichella@sierraclub.org
Subject: Comments on some RETI Phase 1B results

Attachments: Fig 12_core_areas_v6_11_13_08.pdf; Fig 13_corridors_v4_11_13_08.pdf
Hi Johanna and Carl,

I just wanted to provide comments regarding some of the RETI Phase 1B results. I've looked at the Executive Summary and at various maps of the CREZ arrays with particular attention to the western Mojave (Barstow to Tehachapi) where I am most familiar with conditions on the ground.

I noted that the Fairmont and San Bernardino-Lucerne CREZ are identified in Table ES-2 as having minimal environmental concerns. That seems reasonable, as they generally include mostly private lands that are often disturbed by human impact already, are close to population centers, and avoid important habitat for listed species. Being located on the extreme southern margin of the Mojave, development there is less likely to fragment sensitive habitat.

However, I have some concerns about potential solar development in 3 other CREZ, including 2 that are identified in Table ES-2. They are Tehachapi, Kramer, and Inyokern. In looking at the map, it appears that the red dots (which I assume are conceptual or potential locations of solar projects, not actual project sites) again are concentrated on private lands. That's generally a good idea, since the private lands are often (not always) more impacted already than public lands. It also appears that the red dots are located so as to avoid Wildlife Conservation Areas, Wilderness Areas, ACECs, the DTNA, etc. So that's good too.

Here's where I think there may be problems in those 3 CREZ, though. 1) There's potential to fragment remaining habitat for listed species, especially if projects are concentrated in a band to the north of EAFB and along the T/Ls paralleling US 395 north of Kramer Junction and south of Inyokern. To give an example, I'm attaching 2 pdf maps that I had recently prepared for a manuscript on the current status of the Mohave ground squirrel. One map shows known occurrences of the species for the period 1998-2007 and the other focuses on areas where there are known populations and shows possible corridors between them. It should be kept in mind that this is not definitive, but just the best information available at present. There are many areas that have not been surveyed and there may be other populations out there. 2) Although the areas indicated by the red dots are generally not included in Wildlife Conservation Areas or DWMAs, these areas do still provide habitat for listed species like desert tortoise and Mohave ground squirrel. Therefore, developers will be confronted not just with high costs for private land, but with additional costs for purchase of mitigation lands. They may not become aware of the mitigation costs until they've acquired the land and are in the permitting process, which could lead to political backlash. For a 2000-acre CSP project, they could be looking at a 3:1 mitigation ratio with land acquisition and endowment costs of ~\$8000/acre. If my calculator is correct this could be \$50 million or so. I would like to be sure that these numbers are considered in assessing the economic cost of electricity. An economic argument for using previously disturbed land!!

In the agenda for the RETI SSC meeting tomorrow, I see that the 1% development cap is to be discussed. Presumably, this refers to ground disturbance limitations put on Wildlife Conservation Areas in the BLM West Mojave Plan. Of course, BLM can certainly allow development up to that limit if they wish, but it's a limitation for 30 years and they may not want to spend it all at once on a few solar projects.

It might be wiser to use it on wind projects where the footprint is not so massive. I would strongly urge that if solar projects are sited in WCAs using this 1% allocation, they be carefully examined for their effects in destroying and fragmenting valuable habitat. Basically I would want these projects to stay out of WCAs.

Finally, the agenda calls for CEC assessment of land ownership fragmentation and zoning on developability. Any mechanisms for overcoming fragmented land ownership as a barrier to renewables development on previously disturbed private land should be energetically pursued.

I hope this lengthy communication is of some help. Sorry I didn't get it to you earlier.

Cheers,
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